

MEMO ENDORSED

BARON ASSOCIATES P.C.

Attorneys & Counselors At Law

2509 Avenue U Brooklyn, New York 11229 Tel (718) 934-6501 Fax (718) 648-7781

www.baronassoc.com email:baronassociates@aol.com

Via Facsimile (212)805-7906

Hon. Denny Chin
United States District Court
Southern District of New York
500 Pearl Street, Room 1020
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/23/2007

October 16, 2007

Re: Patricia Conradt, as Administratrix v. NBC Universal, Inc.

Docket No.: 07-CV-06623

Our File No.: 7385

Honorable Judge Chin:

I write to you further to my telephone call with your chambers of earlier this date, regarding a request for an extension of the page limit for plaintiff's opposition to defendant's Motion to Dismiss in the above referenced matter.

As the Court is aware from service of plaintiff's Complaint, said Complaint encompasses multiple causes of action, and numerous legal issues. Further, defendant has cited to over seventy-five (75) cases within her Motion to Dismiss, with the majority of said cases having been cited absent any factual presentation, or analysis to the facts of the case at bar.

Accordingly, plaintiff respectfully requests an extension of the page limit for plaintiff's opposition from twenty-five (25) pages to thirty-five (35) pages in order to reasonably address the voluminous cases cited by defendant. Plaintiff will certainly consent to a proportionate page extension for defendant's Reply.

In closing, please be advised that the undersigned contacted the office of defendant's counsel in furtherance of obtaining their consent to said proposed extension prior to contacting the Court. Regrettably, defendant was unwilling to consent, thus occasioning the undersigned's letter application.

We thank the Court for its much valued consideration in entertaining the instant application.

Respectfully submitted,
Baron Associates P.C.

By:

Seth M. Katz (SMK 7915)

cc: Hilary Lane, Esq.

*Approved.
Defendant may
have an
additional five
pages for
its reply*

*SO ORDERED
10/23/07*